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7 Attorney for Defendant Radius Solutions, LLC

8 **UNITED STATES DISTRICT COURT**

9 **DISTRICT OF NEVADA**

11 KATHRYN LONG, individually and on ) Case No. 2:13-cv-01531-APG-VCF  
12 behalf of others similarly situated, )  
13 Plaintiff, ) **DEFENDANT, RADIUS SOLUTIONS,**  
14 vs. ) **LLC'S, UNOPPOSED MOTION FOR**  
15 TORRES CREDIT SERVICES, INC. and ) **EXTENSION OF TIME TO RESPOND TO**  
16 RADIUS SOLUTIONS, INC., ) **PLAINTIFF'S FIRST AMENDED**  
17 Defendants. ) **COMPLAINT**  
18 )  
19 )  
20 )

21  
22 Defendant, Radius Solutions, Inc. n/k/a Radius Solutions, LLC (Radius), through  
23 counsel and under the Federal Rules of Civil procedure, files this Unopposed Motion for  
24 an Extension of Time to Respond to Plaintiff's First Amended Complaint, and states:  
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Defendant Radius Solutions, LLC's Unopposed Motion for Extension

1. On December 23, 2013, plaintiff, Kathryn Long (plaintiff), served her amended complaint and summons on Radius. Radius's responsive pleading is currently due on January 13, 2014.

2. Undersigned counsel, however, requests additional time to review the file materials, conduct an investigation and confer with his client in order to draft an appropriate responsive pleading. In addition, the extension will allow the parties the time necessary to engage in meaningful and good-faith settlement negotiations in hopes the parties can reach a mutually agreeable resolution without the Court's involvement.

3. Plaintiff, through counsel, has agreed to allow Radius an extension of time through and including January 31, 2014 to respond to the complaint.

WHEREFORE, Defendant, Radius Solutions, LLC, respectfully requests this Court grant it an extension through and including January 31, 2014 to respond to the complaint, and for such other relief as this Court deems proper.

Respectfully submitted this 13 day of January, 2014.

## LINCOLN, GUSTAFSON & CERCOS

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Attorney for Defendant,  
Radius Solutions, LLC

**IT IS SO ORDERED.**

**UNITED STATES MAGISTRATE JUDGE**  
**DATED:** 1-14-2014

**CERTIFICATE OF SERVICE**

I certify that on this 13<sup>th</sup> day of January 2014, a copy of the foregoing was filed electronically in the ECF system. Notice of this filing will be sent to the parties of record by operation of the Court's electronic filing system, including Plaintiff's counsel as described below. Parties may access this filing through the Court's system.

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